

## November 1, 2001 ER RSOP Meeting Summary

Attendees: DOE: Joe Legare, Reg Tyler, Norma Castaneda, John Rampe, Scott Surovchak  
EPA: Tim Rehder, Gary Kleeman  
CDPHE: Steve Gunderson, Steve Tarlton, Carl Spreng  
Kaiser-Hill: Lane Butler, Lee Norland, Dave Shelton  
Others: Susan Serreze

Several key issues were discussed – ER RSOP Notification process, stewardship, and OPWL.

### ER RSOP Notification Process

It was agreed that:

Implementation of the ER RSOP and Notification process must be consistent with the in-process characterization/remediation approach.

CDPHE and EPA will have 14 calendar days to review the Notification. The regulatory agencies can approve all or part of the Notification. This will allow work to continue if specific issues require resolution. No response from the regulatory agencies during the 14-day period implies approval. Disapproval of any part of the Notification will be accompanied by the reason for disapproval.

The ER RSOP Notification will include the following:

- Basic project assumptions;
- Map of IHSS/PAC/UBC site that may require remediation;
- List of COCs;
- Stewardship analysis;
- Interim remediation goals;
- Treatment (if necessary);
- RCRA Units and intended waste disposition;
- Project-specific monitoring (if any);
- Projected schedule; and
- Other site-specific information as required (example: special health and safety concerns).

The ER RSOP Notification would be coordinated with the IASAP and BZSAP Addenda at the beginning of the fiscal year but the process could change to quarterly or twice a year if needed. Additional Notifications could be prepared as needed.

The Notification process will include the following:

- Consult on what the notification will include;
- Prepare notification for agency review;



- Attend briefing and come to agreement at briefing.

The regulatory agencies will use RADMS to stay informed about sampling results. Concurrence on the remediation map and when remediation is finished will be through RADMS.

Interim Remediation Goals will be based on RFCA ALs as modified by stewardship and ALARA but they are not a vehicle for open-ended cleanup.

Disagreements that cannot be settled will be elevated through the RFCA process in a matter of hours.

The ER RSOP text will be revised accordingly.

#### Stewardship

It was agreed that the ER RSOP is not the document to address Site long-term stewardship issues. The ER RSOP will include a stewardship evaluation of individual accelerated actions. Recommendations for institutional or engineering controls will be documented in the Closeout Report. Additionally, these recommendations will be summarized annually, and placed in the RI/FS and Stewardship Plan for evaluation in the CAD/ROD.

The ER RSOP text will be revised accordingly.

#### OPWL

It was agreed that the ER RSOP will apply to the OPWL when segments of the OPWL are excavated. This includes segments of the OPWL within IHSSs, PACs, and UBC Sites as well as those segments of IHSS 121 – OPWL that are between other IHSSs, PACs, and UBC Sites. A separate decision document will cover any other OPWL remediation.

The ER RSOP text will be revised accordingly.